**Non-Resident Shareholders:**

In respect of Non-Resident Shareholders, Tax will be deducted at source (“TDS”) under Section 195 and Section 196D of the Act @ 20% (plus applicable surcharge and cess) on the amount of dividend payable unless exempt under the provisions of the Act as given below:

|  |  |  |
| --- | --- | --- |
| **Category of Shareholder** | **Tax Deduction Rate** | **Exemption Applicability/ Documents required** |
| Any non-resident shareholder (including Foreign Institutional Investors, Foreign Portfolio Investors (FII, FPI)) | 20%  (plus applicable surcharge and cess) or Tax Treaty rate whichever is lower | As per Section 90 of the Act, a non-resident shareholder has an option to be governed by the provisions of the Double Taxation Avoidance Agreement (‘DTAA’) between India and the country of tax residence of the shareholder, if such DTAA provisions are more beneficial to such shareholder. To avail the DTAA benefits, the non-resident shareholder will have to compulsorily provide the following documents:   1. Copy of Permanent Account Number (PAN), if available. 2. Self-attested copy of Tax Residency Certificate (‘TRC’) issued by the revenue authorities of the country of which shareholder is tax resident, evidencing and certifying shareholder’s tax residency status during FY 2025-26. 3. E-filed Form 10F filed on the Indian Income-tax e-filing portal valid for the FY 2025-26. 4. Self-declaration of having no taxable presence, fixed base or permanent establishment in India in accordance with the applicable Tax Treaty and Beneficial ownership by the non-resident shareholder  **(**[**Annexure 5**](https://www.hindustanpetroleum.com/documents/pdf/Annexure_5_-_Declaration_regarding_Tax_Residency.docx)).   Application of beneficial DTAA rate shall depend upon the completeness and satisfactory review by the Company of the documents submitted by the Non-Resident shareholders. The Company will apply its sole discretion and is not obligated to apply the beneficial DTAA rates for tax deduction on dividend payable to shareholders.  TDS shall be recovered at 20% (plus applicable surcharge and cess) if any of the above-mentioned documents are not provided. |
| Submitting Order under section 195(3) /197 of the Act | Rate provided in the Order | Lower/NIL withholding tax certificate obtained from Income Tax authorities. |